From: Stephen Ellis To: Miller, Garyo Cc: Satya Dwivedula

Subject: RE: San Jacinto Independent Review Date: Monday, August 18, 2014 3:08:00 PM

Garv.

In addition to reviewing the modeling and other large points of contention do you plan on having an independent review of the FS? There are other elements within the FS which don't seem to be fully addressed. Naturally, some elements will be vague until a remedy is approved, but other elements should be more fully discussed now. For example, I think the RPs consultants need to consider long term effects and costs for the alternatives in more detail. They need to project out the long term effects of the cap alternative and full removal alternative on water quality much longer than 30 years to really be able to compare the effects.

Also, according to what they said in the presentation they gave to us, they really didn't consider the cost of having to conduct significant cap maintenance every few (5-10) years. We find that even on our aboveground caps, we need to do this every 10 years or so and we end up spending a lot more in those years that "typical" O&M. I think they need to look at costs over a much longer period than 30 years also and include in the projection a more significant maintenance event every 10 years or SO.

Sorry about the delayed response.

Stephen Ellis **Project Manager Superfund Section Remediation Division** Texas Commission on Environmental Quality 512-239-5337 stephen.ellis@tceq.texas.gov

From: Miller, Garyg [mailto:Miller.Garyg@epa.gov]

Sent: Thursday, August 07, 2014 7:18 AM

To: Stephen Ellis; Satya Dwivedula; Sharon Barker; Bob Allen; Linda Henry; Garry McMahan; Jane G.

Sarosdy (jane.sarosdy@glo.texas.gov)

Cc: Sanchez, Carlos

Subject: San Jacinto Independent Review

Folks,

I am preparing a list of tasks to be accomplished for the independent review to be performed for the San Jacinto site. For example, the tasks may include evaluations/assessments of river hydrology/modeling, containment issues, removal options/dredging, etc. I would appreciate any



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suggestions you may wish to make to develop information that would aid in remediating the San Jacinto site. Please let me know any ideas by nearly next week if possible.

Thanks,

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